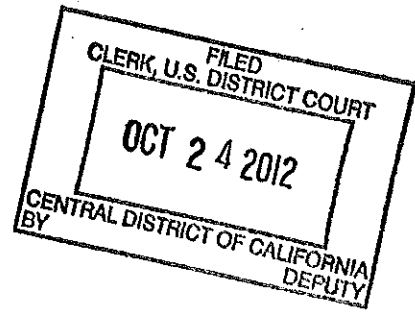


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6 Attorneys for Plaintiff
Warner Bros. Home Entertainment Inc.



8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 Warner Bros. Home Entertainment Inc.,
11 Plaintiff,

12 v.

13 Ramses Coro, an individual and d/b/a
14 Amazon.com Seller rc_goods and Does 1-
15 10, inclusive,
16 Defendants.

CV12-09157DDP(MRWx)

COMPLAINT FOR COPYRIGHT
INFRINGEMENT

DEMAND FOR A JURY TRIAL

17
18 Plaintiff Warner Bros. Home Entertainment Inc. ("Warner Bros.") for its
19 Complaint allege as follows:

20 **A. Introduction**

21 1. Warner Bros. owns exclusive United States distribution rights in
22 various creative works, including, but not limited to, *Fringe*, *The Closer* and *The Big*
23 *Bang Theory* ("the Warner Bros. Works"). Each of the Warner Bros. Works is
24 entitled to copyright protection. Defendants, through the online venue Amazon.com,
25 distribute, promote, offer for sale and sell counterfeit copies of the Warner Bros.
26 Works (the "Counterfeit Product"). Warner Bros. is informed and believes and based
27 thereon alleges that this infringement activity is systematic and willful or done with
28 reckless disregard of Warner Bros.' intellectual property rights. Warner Bros. asks

1 that this Court enjoin that activity and order Defendants to pay damages pursuant to
2 the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.* (the "Copyright Act.").

3 **B. Jurisdiction and Venue**

4 2. Plaintiff brings this action pursuant to 17 U.S.C. §§ 101, *et seq.* The
5 Court has jurisdiction over the subject matter pursuant to 28 U.S.C. § 1331 and §
6 1338(a).

7 3. The events giving rise to the claim alleged herein occurred, among other
8 places, within this judicial district. Venue in the Central District of California is
9 proper pursuant to 28 U.S.C. § 1391(b) and § 1400(a).

10 **C. Warner Bros.**

11 4. Warner Bros. is a corporation duly organized and existing under the
12 laws of the State of Delaware, having its principal place of business in Burbank,
13 California.

14 5. Warner Bros. and certain of its affiliated companies are engaged in a
15 variety of businesses including, without limitation, the production and distribution of
16 motion pictures and television programs.

17 6. Warner Bros. owns exclusive rights under the Copyright Act to the
18 Warner Bros. Works, including the rights to reproduce, distribute or license the
19 reproduction and distribution of the motion pictures in video format in the United
20 States, including, but not limited to, those copyrights that are the subject of the
21 copyright registrations which are listed in Exhibit "A," attached hereto, and
22 incorporated herein by this reference. Video format includes, but is not limited to,
23 digital versatile discs ("DVDs") and Blu-ray discs.

24 7. The expression and other distinctive features of the Warner Bros. Works
25 are wholly original with Warner Bros., its licensors and/or assignors and, as fixed in
26 various tangible media, are copyrightable subject matter under the Copyright Act.

27 8. Warner Bros. has secured from Warner Bros. Entertainment Inc. and
28

1 Home Box Office, Inc. the exclusive rights and privileges to reproduce, distribute, or
2 license the reproduction or distribution of the Warner Bros. Works throughout the
3 United States. Warner Bros., its affiliates, licensees and/or assignors have complied in
4 all respects with the laws governing copyright.

5 9. The Warner Bros. Works have been manufactured, sold and/or
6 otherwise distributed in conformity with the provisions of the copyright laws.
7 Warner Bros., its affiliates, licensees and/or assignors have complied with their
8 obligations under the copyright laws, and Warner Bros., in its own right or as
9 successor-in-interest, has at all times been and still is the sole proprietor or otherwise
10 authorized to enforce all right, title and interest in and to the copyrights or to enforce
11 its exclusive rights for home video distribution in each of the Warner Bros. Works.

12 **D. Defendants**

13 10. Defendant Ramses Coro ("Coro") is an individual and does business on
14 Amazon.com using the seller identity, "rc_goods". Plaintiff is informed and believes
15 that Coro is a resident of Miami, in the State of Florida. Plaintiff is informed and
16 believes Coro transacts business in this judicial district through offers and sales of
17 the Counterfeit Product in this judicial district, among other places.

18 11. Upon information and belief, Does 1 – 10 are either entities or
19 individuals who are residents of or present in this judicial district and are subject to the
20 jurisdiction of the Court. Upon information and belief, Does 1 – 10 are principals,
21 supervisory employees, or suppliers of Defendant or other entities or individuals who,
22 in this judicial district, are manufacturing, distributing, selling and/or offering for sale
23 merchandise which infringes the Warner Bros. Works. The identities of the various
24 Does are unknown to Warner Bros. at this time. The Complaint will be amended to
25 include the names of such individuals when identified. The Defendant and Does 1 –
26 10 are collectively referred to herein as "Defendants."

27 **E. Defendants' Infringing Activities**

1 12. Amazon.com, Inc. is a Delaware corporation with its principal place of
2 business in Seattle, Washington. Amazon.com, Inc. operates retail websites which
3 include www.amazon.com, www.amazon.co.uk, www.amazon.de,
4 www.amazon.co.jp, www.amazon.fr, www.amazon.ca, www.amazon.cn,
5 www.amazon.it and www.amazon.es.

6 13. Among other things, through its websites, Amazon.com, Inc. offers e-
7 commerce platforms that enable third parties to sell products on Amazon.com (the
8 "Website"). The Website provides services to third-party sellers, including the
9 Defendants. Such services include, but are not limited to, design of the webpage
10 describing and/or illustrating the product being offered by third-party Amazon.com
11 sellers, access to the Internet community seeking product offered by the third-party
12 sellers and fulfillment services through which Amazon.com sellers can have goods
13 shipped from Amazon.com warehouses using Amazon.com employees to perform
14 packaging and shipping services.

15 14. More than two million Amazon.com users employ the Amazon.com e-
16 commerce platform to offer product or services to Internet users. Smaller sellers
17 participate in Amazon Marketplace where they offer new, used and collectible
18 selections at fixed prices to Amazon customers around the world.

19 15. Among the third-party sellers who employ the Website platform to
20 market, offer, sell and distribute their merchandise are the Defendants. The
21 Defendants have employed the Website to market, offer, sell and distribute the
22 Counterfeit Product. Warner Bros. is informed and believes and based thereon
23 alleges that the Defendants have distributed, advertised and/or sold and continue to
24 copy, reproduce, distribute, advertise and/or sell unauthorized copies of motion
25 pictures owned by Warner Bros., including, but not necessarily limited to, the
26 Warner Bros. Works identified in paragraph 1, above, and Exhibit "A." Defendants
27 do so using the Website. Defendants have not been authorized by Warner Bros. to
28

1 reproduce, distribute, sell or offer for sale any of the Warner Bros. Works.

2 16. By engaging in this conduct, Defendants have acted in willful disregard
3 of laws protecting Warner Bros.' copyrights. Warner Bros. has sustained and will
4 continue to sustain substantial damage to the value of its creative works, specifically
5 including the Warner Bros. Works.

6 **F. Warner Bros.'s Damages**

7 17. Warner Bros. is informed and believes, and upon that basis alleges, that
8 the Defendants have each obtained gains, profits and advantages as a result of their
9 infringing activity in amounts within the jurisdiction of the Court.

10 18. Warner Bros. is informed and believes, and upon that basis alleges, that
11 it has suffered and continues to suffer direct and actual damages as a result of
12 Defendants' infringing conduct, in amounts within the jurisdiction of the Court. In
13 order to determine the full extent of such damages, including such profits as may be
14 recoverable under 17 U.S.C. § 504, Warner Bros. will require an accounting from
15 each Defendant of all monies generated from the promotion, display, sale and offer
16 for sale of the Defendants' goods and services using the Warner Bros. Works. In the
17 alternative, Warner Bros. may elect to recover statutory damages pursuant to 17
18 U.S.C. § 504 (c) for each of the Warner Bros. Works infringed.

19 19. Warner Bros. has no other adequate remedy at law and has suffered and
20 continues to suffer irreparable harm and damage as a result of the above-described
21 acts. Warner Bros. is informed and believes, and upon that basis alleges, that, unless
22 enjoined by the Court, Defendants' infringing activity will continue, with attendant
23 irreparable harm to Warner Bros. Accordingly, Warner Bros. seeks preliminary and
24 permanent injunctive relief pursuant to 17 U.S.C § 502 and seizure of the Counterfeit
25 Product, including the means of production as provided by 17 U.S.C. § 503.

26 20. By reason of the foregoing, Warner Bros. has incurred and will continue
27 to incur attorneys' fees and other costs in connection with the prosecution of its claims,
28

1 which attorneys' fees and costs Warner Bros. is entitled to recover from the
2 Defendants, and each of them, pursuant to 17 U.S.C. § 505.

3 21. Warner Bros. is without an adequate remedy at law in that damages are
4 difficult to ascertain and, unless the Defendants' acts are enjoined, Warner Bros. will
5 be irreparably harmed by Defendants' deliberate and systematic infringement of its
6 rights.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, Warner Bros. asks this Court to order that:

9 1. Defendants, their agents, servants, employees, representatives,
10 successor and assigns, and all persons, firms, corporations or other entities in active
11 concert or participation with any of the said Defendants, be immediately and
12 permanently enjoined from directly or indirectly infringing the Warner Bros. Works
13 in any manner, including generally, but not limited to:

- 14 a. Reproducing, distributing, shipping, selling or offering for sale
15 unauthorized copies, in any format, of any of the Warner Bros. Works;
16 b. Aiding or abetting the reproduction, distribution, shipment, sale or offer
17 for sale of any unauthorized copies of any of the Warner Bros. Works;
18 or
19 c. Marketing, advertising and/or promoting any unauthorized copies of the
20 Warner Bros. Works.

21 2. That Warner Bros. and its designees are authorized to seize the following
22 items which are in Defendants' possession, custody or control:

- 23 a. All Counterfeit Product;
24 b. Any other unauthorized product which reproduces, copies,
25 counterfeits, imitates or bear any of the Warner Bros. Works, or any
26 part thereof;
27 c. Any molds, screens, patterns, plates, negatives, machinery or
28

1 equipment, specifically including computers, servers, optical disc
2 burners and other hardware used for making or manufacturing the
3 Counterfeit Product or unauthorized product which reproduces, copies,
4 counterfeits, imitates or bear any of the Warner Bros. Works, or any
5 part thereof.

6 3. Defendants be required to pay actual damages increased to the
7 maximum extent permitted by law and/or statutory damages at Warner Bros.'
8 election;

9 4. Defendants be required to account for and pay over to Warner Bros. all
10 damages sustained by Warner Bros. and profits realized by Defendants by reason of
11 Defendants' unlawful acts herein alleged and that those profits be increased as
12 provided by law;

13 5. Defendants be required to pay Warner Bros. their costs of this action
14 and reasonable attorneys' fees; and

15 6. Warner Bros. be granted all other and further relief the Court may deem
16 just and proper under the circumstances.

17
18 Dated: October 24, 2012

J. Andrew Coombs, A Professional Corp.

19
20 By: 

21 J. Andrew Coombs
22 Nicole L. Drey
23 Attorneys for Plaintiff Warner Bros.
24 Home Entertainment Inc.
25
26
27
28

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff Warner Bros. Home Entertainment Inc. hereby demands a trial by jury of all issues so triable.

Dated: October 24, 2012

J. Andrew Coombs, A Professional Corp.

By: 

J. Andrew Coombs
Nicole L. Drey
Attorneys for Plaintiff Warner Bros.
Home Entertainment Inc.

EXHIBIT "A"**COPYRIGHT REGISTRATIONS**

<u>Copyright Registration Number:</u>	<u>Title of Work:</u>	<u>Claimant of Work:</u>
	FRINGE: Season Four	
PA 1-805-639	FRINGE: Neither Here Nor There	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: One Night In October	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Alone In The World	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Subject 9	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Novation	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: And Those We've Left Behind	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Wallflower	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Back To Where You've Never Been	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Enemy Of My Enemy	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Forced Perspective	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Making Angels	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Welcome To Westfield	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: A Better Human Being	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: The End Of All Things	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: A Short Story About Love	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Nothing As It Seems	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Everything In Its Right Place	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: The consultant	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Letters Of Transit	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Worlds Apart	Warner Bros. Entertainment Inc.
Application Pending	FRINGE: Brave New World: Part One	Warner Bros. Entertainment Inc.
PA 1-805-612	FRINGE: Brave New World: Part Two	Warner Bros. Entertainment Inc.
	THE CLOSER: Season	

	Seven	
PA 1-805-616	THE CLOSER: Unknown Trouble	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Repeat Offender	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: To Serve With Love	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Under Control	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Forgive Us Our Trespasses	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Home Improvement	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: A Family Affair	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Death Warrant	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Star Turn	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Fresh Pursuit	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Necessary Evil	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: You Have The Right To Remain Jolly	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Relative Matters	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Road Block	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Silent Partner	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Hostile Witness	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Fool's Gold	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Drug Fiend	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Last Rites	Warner Bros. Entertainment Inc.
Application Pending	THE CLOSER: Armed Response	Warner Bros. Entertainment Inc.
PA 1-805-629	THE CLOSER: The Last Word	Warner Bros. Entertainment Inc.
	THE BIG BANG THEORY: Season Five	
PA 1-805-604	THE BIG BANG THEORY: The Skank Reflex Analysis	Warner Bros. Entertainment Inc.
Application Pending	THE BIG BANG THEORY: The Infestation Hypothesis	Warner Bros. Entertainment Inc.

1	Application Pending	THE BIG BANG THEORY: The Pulled Groin Extrapolation	Warner Bros. Entertainment Inc.
2	Application Pending	THE BIG BANG THEORY: The Wiggly Finger Catalyst	Warner Bros. Entertainment Inc.
3	Application Pending	THE BIG BANG THEORY: The Russian Rocket Reaction	Warner Bros. Entertainment Inc.
4	Application Pending	THE BIG BANG THEORY: The Rhinitis Revelation	Warner Bros. Entertainment Inc.
5	Application Pending	THE BIG BANG THEORY: The Good Guy Fluctuation	Warner Bros. Entertainment Inc.
6	Application Pending	THE BIG BANG THEORY: The Isolation Permutation	Warner Bros. Entertainment Inc.
7	Application Pending	THE BIG BANG THEORY: The Ornithophobia Diffusion	Warner Bros. Entertainment Inc.
8	Application Pending	THE BIG BANG THEORY: The Flaming Spittoon Acquisition	Warner Bros. Entertainment Inc.
9	Application Pending	THE BIG BANG THEORY: The Speckerman Recurrence	Warner Bros. Entertainment Inc.
10	Application Pending	THE BIG BANG THEORY: The Shiny Trinket Maneuver	Warner Bros. Entertainment Inc.
11	Application Pending	THE BIG BANG THEORY: The Recombination Hypothesis	Warner Bros. Entertainment Inc.
12	Application Pending	THE BIG BANG THEORY: The Beta Test Initiation	Warner Bros. Entertainment Inc.
13	Application Pending	THE BIG BANG THEORY: The Friendship Contraction	Warner Bros. Entertainment Inc.
14	Application Pending	THE BIG BANG THEORY: The Vacation Solution	Warner Bros. Entertainment Inc.
15	Application Pending	THE BIG BANG THEORY: The Rothman Disintegration	Warner Bros. Entertainment Inc.
16	Application Pending	THE BIG BANG THEORY: The Werewolf Transformation	Warner Bros. Entertainment Inc.
17	Application Pending	THE BIG BANG THEORY: The Weekend Vortex	Warner Bros. Entertainment Inc.
18	Application Pending	THE BIG BANG THEORY: The Transporter Malfunction	Warner Bros. Entertainment Inc.

Application Pending	THE BIG BANG THEORY: The Hawking Excitation	Warner Bros. Entertainment Inc.
Application Pending	THE BIG BANG THEORY: The Stag Convergence	Warner Bros. Entertainment Inc.
Application Pending	THE BIG BANG THEORY: The Launch Acceleration	Warner Bros. Entertainment Inc.
PA 1-805-577	THE BIG BANG THEORY: The Countdown Reflection	Warner Bros. Entertainment Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Dean D. Pregerson and the assigned discovery Magistrate Judge is Michael Wilner.

The case number on all documents filed with the Court should read as follows:

CV12- 9157 DDP (MRWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

J. Andrew Coombs (SBN 123881)
Nicole L. Drey (SBN 250235)
J. Andrew Coombs, A P. C.
517 E. Wilson Ave., Suite 202
Glendale, California 91206
Telephone: (818) 500-3200
Facsimile: (818) 500-3201

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Warner Bros. Home Entertainment Inc.,

Plaintiff(s).

v.

Ramses Coro [see attachment],

Defendant(s)

CASE NUMBER

CV 12-09157

DDP(MRWx)

SUMMONS

TO: THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to file with this court and serve upon plaintiff's attorney
J. Andrew Coombs, whose address is:

J. Andrew Coombs, A P. C.
517 E. Wilson, Suite 202
Glendale, California 91206

an answer to the ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim
which is herewith served upon you within 21 days after service of this Summons upon you, exclusive
of the day of service. If you fail to do so, judgment by default will be taken against you for the relief
demanded in the complaint.

CLERK, U.S. DISTRICT COURT

Date:

(, 2012

OCT 24 2012

By:

JULIE PRADO

Deputy Clerk

(Seal of the Court)

SUMMONS

SUMMONS ATTACHMENT

Warner Bros. Home Entertainment Inc.,

Plaintiff,

v.

Ramses Coro, an individual and d/b/a Amazon.com Seller rc_goods and
Does 1-10, inclusive,

Defendants.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Warner Bros. Home Entertainment Inc.	DEFENDANTS Ramones Coro, an individual and d/b/a Amazon.com Seller rc_goods and Does 1-10, inclusive
(b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases): Los Angeles	County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only):
(c) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) J. Andrew Coombs (SBN 123881) J. Andrew Coombs, A Professional Corporation 517 E. Wilson Ave., Suite 202 Glendale, California 91206 / Tel.: (818) 500-3200 Fax. (818) 500-3201	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)
☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)
CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT: \$** _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Copyright Infringement 17 U.S.C. §§ 101 et seq.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition TORRENTURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? ☐ Yes ☐ No

If yes, list case number(s):

FOR OFFICE USE ONLY: Case Number: _____

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or

☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or

☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or

☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

☐ Check here if the U.S. government, its agencies or employees is a named plaintiff.

Los Angeles

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

☐ Check here if the U.S. government, its agencies or employees is a named defendant.

Florida

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

Note: In land condemnation cases, use the location of the tract of land involved.

Los Angeles

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date

10-24-12

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))